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March 4, 2024

Via ECF

The Honorable Brian M. Cogan
United States District Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *United States v. Garcia Luna* 19 Cr. 576 (BMC)

Dear Judge Cogan,

We write, with the consent of the government, to respectfully request that the Court permit the defense to file a reply to the government's opposition to the defense's post-trial motions by March 20, 2024. After the defense filed its post-trial motions on December 15, 2023, the government filed a letter motion, on consent, asking for additional time to respond to the motions. Prior to this request the government's opposition was due on January 19, 2024, and the defense's reply was due on February 2, 2024. The Court granted the government's letter motion and set the opposition due date as March 1, 2024, but did not set a new reply date. The government filed its opposition on March 1, 2024. The government consents to the defense's request that it be permitted to file a reply by March 20, 2024.

Accordingly, we respectfully request that the Court set March 20, 2024, as the due date for the defense's reply to the government's opposition.

Respectfully submitted,

/s/

César de Castro
Valerie Gotlib
Shannon McManus
Florian Miedel

Cc: all counsel of record (via ECF)